

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LINDA SUE SEXTON and MICHAEL SEXTON,

Plaintiffs,
v.

HON. MARK A. GOLDSMITH
Case No. 2:19-cv-12574-MAG-APP

LARRY LYNN DUNN, THOMAS
CERNUTO, REDFORD CHARTER
TOWNSHIP, a municipal corporation,
jointly and severally,

**DEFENDANT THOMAS
CERNUTO'S LAY AND
EXPERT WITNESS LIST**

Defendants.

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**DEFENDANT THOMAS CERNUTO'S
LAY AND EXPERT WITNESS LIST**

NOW COMES Defendant Thomas Cernuto (“Defendant Cernuto”), by and through his attorneys, KELLER THOMA, P.C., for his Lay and Expert Witness List, states as follows:

1. Thomas Cernuto
4113 Detroit Street
Dearborn Heights, Michigan 48125
(May be contacted through counsel only)
2. Defendant Larry Dunn
Address unknown
(May be contacted through counsel only)
3. Plaintiff Linda Sue Sexton
Address Unknown
(May be contacted through counsel only)
4. Plaintiff Michael Sexton
Address Unknown
(May be contacted through counsel only)
5. Matthew Sawicki
17th District Court Administrator
15111 Beech Daly
Redford Twp., MI 48239
(May be contacted through Defendant Redford Township’s counsel only)
6. Custodian of records for:
 - a. Redford Township;
 - b. 17th District Court;
 - c. Wayne County’s Prosecutor’s Office;

- d. Wayne County (3rd) Circuit Court;
 - e. Michigan State Police;
 - f. Any and all past and present employers of Plaintiff Linda Sexton;
 - g. Any and all past and present employers of Plaintiff Michael Sexton;
 - h. Any and all health professionals, insurers, and/or providers who have been involved in the health care, diagnosis, treatment, testing, and/or evaluation of Plaintiff Linda Sexton, including but not limited to, doctors, therapists, psychologists, social workers, physician assistants, nurses, laboratory personnel or others;
 - i. Any and all health professionals, insurers, and/or providers who have been involved in the health care, diagnosis, treatment, testing, and/or evaluation of Plaintiff Michael Sexton, including but not limited to, doctors, therapists, psychologists, social workers, physician assistants, nurses, laboratory personnel or others.
7. Any and all of Plaintiff Linda Sexton's primary care and treating physicians.
8. Any and all of Plaintiff Michael Sexton's primary care and treating physicians.
9. Any and all hospitals and medical facilities where Plaintiff Linda Sexton sought treatment.
10. Any and all hospitals and medical facilities where Plaintiff Michael Sexton sought treatment.
11. Any and all counseling facilities where Plaintiff Linda Sexton sought treatment.

12. Any and all counseling facilities where Plaintiff Michael Sexton sought treatment.

13. Any and all past employees of Defendant Redford Township.

14. Any and all past employees of 17th District Court.

15. Any and all past employers of Plaintiff Linda Sexton.

16. Any and all past employees of Plaintiff Michael Sexton.

17. Any and all physicians, psychologists, psychiatrists, or other medical professionals who have examined and/or treated Plaintiff Linda Sexton.

18. Any and all physicians, psychologists, psychiatrists, or other medical professionals who have examined and/or treated Plaintiff Michael Sexton.

19. Harvey Ager, M.D.
29355 Northwestern Hwy., #140
Southfield, MI 48034

20. Any and all rebuttal or impeachment witnesses.

21. Any and all witnesses identified through additional discovery or investigation.

22. Any and all witnesses disclosed at trial.

23. Any and all witnesses listed on Plaintiffs' Lay and Expert Witness List.

24. Any and all witnesses listed on Defendant Redford Township's Lay and Expert Witness List.

25. Any and all witnesses listed on Defendant Larry Dunn's Lay and Expert Witness List.

26. Defendant Cernuto reserves the right to add or delete the names from his Witness List pursuant to further discovery or investigation.

27. Defendant Cernuto reserves the right to add the name of any expert witness(es) where the said expert is not determined until discovery or investigation is completed.

By submitted this Lay and Expert Witness List, Defendant Thomas Cernuto does not waive any objections to the admissibility of the testimony of these witnesses. Instead, this list is being submitted indicating potential witnesses Defendant Cernuto may produce.

Respectfully submitted,

KELLER THOMA, P.C.

By: /s/ Kathryn E. Jones
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Dated: February 28, 2020

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2020, I electronically filed the foregoing paper, ***Defendant Thomas Cernuto's Lay and Expert Witness List*** with the Clerk of the Court using the ECF system which will send notification to all counsel of record.

By: /s/ Kathryn E. Jones
Kathryn E. Jones (P75431)